Facility Name: **Archer Daniels Midland Company (ADM)**
City: Valdosta
County: Lowndes
AIRS #: 04-13-185-00051 Application #: 599310

Date SIP Application Received: November 19, 2021
Date Title V Application Received: November 19, 2021
Permit No: 2075-185-0051-V-03-3

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Introduction

This narrative is being provided to assist the reader in understanding the content of the referenced SIP permit to construct and draft operating permit amendment. Complex issues and unusual items are explained in simpler terms and/or greater detail than is sometimes possible in the actual permit. This permit is being issued pursuant to: (1) Sections 391-3-1-.03(1) and 391-3-1-.03(10) of the Georgia Rules for Air Quality Control, (2) Part 70 of Chapter I of Title 40 of the Code of Federal Regulations, and (3) Title V of the Clean Air Act Amendments of 1990. The following narrative is designed to accompany the draft permit and is presented in the same general order as the permit. This narrative is intended only as an adjunct for the reviewer and has no legal standing. Any revisions made to the permit in response to comments received during the public comment period and EPA review process will be described in an addendum to this narrative.

I. Facility Description

A. Existing Permits

Table 1 below lists the current Title V permit, and all administrative amendments, minor and significant modifications to that permit, and 502(b)(10) attachments. An off permit changed for the replacement of a cottonseed extractor was approved on June 26, 2019.

Table 1: Current Title V Permit and Amendments

Permit/Amendment Number	Date of Issuance	Description
2075-185-0051-V-03-0	12-Dec-2016	Title V Renewal
2075-185-0051-V-03-1	22-Feb-2017	Incorporate existing equipment into the Emission Units Table
2075-185-0051-V-03-2	29-Mar-2019	Expansion of the existing soybean processing equipment that will enable the facility to increase its soybean processing capacity.

B. Regulatory Status

1. PSD/NSR/RACT

The facility is located in Lowndes County, which is classified as "attainment" or "unclassifiable" for all criteria pollutants.

The facility is currently a major source under PSD for CO, NOx and VOC. In 1995, the facility underwent PSD review for VOCs in order to add the Cottonseed Oil Extraction Plant at the site. For PSD purpose, the facility has a limit on the hexane consumption at its oil extraction units in the oil mills. The facility avoided PSD review for PM_{10} emissions by limiting the increase in potential PM_{10} emissions below the PSD significance level of 15 tons per year. The VOC BACT required limiting the solvent loss, the amount of soybeans processed by the oil mills, and the amount of crude vegetable oil processed at the facility. PSD avoidance limits were also set for PM_{10} on the amount of soybeans processed at the two (2) grain dryers at the facility and on NOx and CO emissions from the combustion sources.

In 2018, the facility underwent PSD review to expand the soybean processing capacity of the facility from 100,000 bushels per day (1,095,000 tons/year) to 130,000 bushels per day (1,423,500 tons/year). The modification resulted in emissions increases in NOx, CO, VOC, SO_2, and $PM/PM_{10}/PM_{2.5}$. VOC was the only pollutant above the PSD significant modification threshold. PSD avoidance limits on process weight rates were included for Rail Receiving, Truck Receiving, Bean Heater, Secondary Dehuller, Meal Grinder, Rail Loadout and Truck Loadout.

2. Title V Major Source Status by Pollutant

Table 2: Title V Major Source Status

Pollutant	Is the Pollutant Emitted?	If emitted, what is the facility's Title V status for the Pollutant?		
		Major Source Status	Major Source Requesting SM Status	Non-Major Source Status
PM	Y	✓		
PM_{10}	Y	✓		
$PM_{2.5}$	Y	✓		
SO_2	Y			✓
VOC	Y	✓		
NO_x	Y	✓		
CO	Y	✓		
TRS	N/A			✓
H_2S	N/A			✓
Individual HAP	Y	✓		
Total HAPs	Y	✓		

II. Proposed Modification

A. Description of Modification

The facility proposes to install a new, natural gas-fired boiler, with a gross heat input of 144 million BTU per hour (MMBtu/hr) and the capability to burn fuel oil during times of gas curtailment.

In addition to installing the new Boiler, the Facility will remove the following units from operation:

- 95 MMBtu/hr Biomass Wellons Boiler (EU 630),
- 75 MMBtu/hr Natural gas Cleaver Brooks Boiler (EU 640), and
- Two (2) 52 MMBtu/ hr Biomass Hurst Boilers (EU B115A and B115B).

B. Emissions Change

Emissions factors used to calculate the potential to emit (PTE) for the Boiler were obtained from a combination of U.S. EPA's AP-42 and vendor-provided emissions data. PTE was calculated using 8360 hrs/year, 0.046 lbs NOx/MMBtu and 0.09 lbs CO/MMBtu for natural gas and 400 hrs/year, 0.15 lbs NOx/MMBtu, 0.036 lbs CO/MMBtu and 0.3% sulfur NSPS Db standard for fuel oil (Application No. 599310 inadvertently used 0.03% sulfur).

A PSD applicability determination was made based on the total project-related emissions increases from the project, which is the construction of the new boiler. In this case, because the Project consists of only a new emissions unit, the project-related emissions are equivalent to the PTE of the Boiler. The Facility will not take credit for the emissions decreases from the units being removed.

Table 3: Emissions Change Due to Modification

Pollutant	Is the Pollutant Emitted?	Net Actual Emissions Increase (tpy)	Potential Emissions Increase from New Boiler (tpy)
PM	Y	--	--
PM_{10}	Y	--	4.97
$PM_{2.5}$	Y	--	4.81
SO_2	Y	--	9.31
VOC	Y	--	3.39
NO_x	Y	--	32.01
CO	Y	--	56.79
TRS	N	--	--
H_2S	N	--	--
Individual HAP	Y	--	> 10.00
Total HAPs	Y	--	> 25.00

C. PSD/NSR Applicability

The 144 MMBtu/hr boiler is categorized as a new emissions unit for the purposes of PSD applicability. There are no other modified or affected emissions units associated with this project. Calculating PSD Applicability, the facility did not take any credit for the emissions units to be removed as part of the project, therefore no "netting" took place. Also, because the boiler is a new emission unit, emissions calculated for the boiler are based upon operating hours of 8,360 hours using natural gas, and 400 hours firing fuel oil which is a conservative estimate based upon prior years' consumption. Potential NOx emissions from natural gas using AP-42 factors would have been above the significant modification threshold of 40 tpy. Therefore, NOx emissions will be limited by permit condition to 0.046 lbs/MMBtu on a 30-day rolling average while burning natural gas. NOx emissions will be limited while burning fuel oil by NSPS Db.

Because the Project's emissions increase for NSR regulated pollutants fall below the PSD significant levels, a netting evaluation was not required. In addition, there will be no upstream or downstream emissions changes associated with the Project and there are no contemporaneous emissions increases associated with the Boiler. Therefore, the Project does not meet the definition of a major modification under PSD.

IV. Regulated Equipment Requirements

A. Brief Process Description

The current configuration of the Facility includes a cottonseed oil extraction plant, a soybean oil extraction plant, a vegetable oil refinery, a vegetable oil packaging plant, and a trucking terminal.

Soybeans or cottonseed are received by either truck or rail and conveyed to storage silos. On infrequent occasions when the beans have high moisture content, such as during harvest time, they may be dried in a grain dryer after being cleaned. From the bulk storage silos, the soybeans or cottonseed are processed in a series of operations prior to vegetable oil extraction.

The flakes from the pre-extraction processing steps are conveyed to a countercurrent solvent extraction system. In the extractor, soybean flakes are mixed with an organic solvent (typically commercial-grade hexane) and oil is extracted from the flakes as the solvent and flakes move in countercurrent flow through a series of extraction steps within the extraction system. The solvent- oil mixture (miscella) from the extractor is then processed to separate the solvent from the oil. The solvent is recovered from the solvent/oil mixture using steam (contact and non-contact). The solvent is then condensed, gravity separated from the condensate, and reused. Residual hexane in the non-condensable gases exiting this process is recovered in a mineral oil scrubber before the non-condensable gases are vented to a stack.

The defatted (spent) flakes from the extraction step are sent through a series of process operations to desolventize, dry, and then grind the resulting soybean meal. The meal and hulls are transferred to storage. From there, they are loaded out either by rail or truck for shipment off-site. Some of the desolventized vegetable oil is sent to the on-site vegetable oil refinery for further processing.

B. Equipment List for the Process

Emission Units		Specific Limitations/Requirements		Air Pollution Control Devices	
ID No.	**Description**	**Applicable Requirements/Standards**	**Corresponding Permit Conditions**	**ID No.**	**Description**
TBD	144 MMBtu/hr natural gas fired boiler	391-3-1-.02(2)(d) 391-3-1-.02(2)(g) 40 CFR 60, Subpart A 40 CFR 60, Subpart Db 40 CFR 63, Subpart A 40 CFR 63, Subpart DDDDD		None	N/A
~~630~~	~~95 MMBtu/hr Biomass Wellons Boiler~~	~~391-3-1-.02(2)(d)~~ ~~391-3-1-.02(2)(g)~~ ~~40 CFR 63, Subpart DDDDD~~	~~3.2.3, 3.2.6, 3.2.7, 3.2.8, 3.2.10, 3.3.3, 3.3.12 through 3.3.16, 3.3.19, 3.2.20, 3.4.3, 3.4.4, 5.2.2, 5.2.8, 5.2.10, 6.2.18 through 6.2.23~~	~~631, 632, 633~~	~~Multiclone, 2 Baghouses~~
~~640~~	~~75 MMBtu/hr Natural gas Cleaver Brooks Boiler~~	~~391-3-1-.02(2)(d)~~ ~~391-3-1-.02(2)(g)~~ ~~40 CFR 63, Subpart DDDDD~~	~~3.2.3, 3.2.6, 3.2.7, 3.2.9, 3.2.10, 3.3.2, 3.3.12 through 3.3.16, 3.3.17, 3.3.18, 3.4.3, 3.4.4, 5.2.2, 5.2.8, 5.2.10, 6.2.18 through 6.2.23~~	~~None~~	~~N/A~~

~~B115A~~	~~52 MMBtu/ hr Biomass Hurst Boiler~~	~~40 CFR 52.21~~ ~~40 CFR 60, Subpart A~~ ~~40 CFR 60, Subpart Dc~~ ~~40 CFR 63, Subpart DDDDD~~ ~~391-3-1-.02(2)(d)~~ ~~391-3-1-.02(2)(g)~~ ~~391-3-1-.03(2)(c)~~	~~3.2.11, 3.3.3, 3.3.4, 3.3.5, 3.3.6, 3.3.7, 3.3.8, 3.3.9, 3.3.10, 3.3.11, 3.3.12 through 3.3.16, 3.3.21, 3.3.22, 4.1.3, 4.2.8, 4.2.9, 4.2.10, 5.1.1, 5.2.1, 5.2.2, 5.2.8, 5.2.9, 5.2.10. 5.2.11, 6.1.7, 6.2.18 through 6.2.26~~	~~ESP-661~~	~~Electrostatic Precipitator~~
~~B115B~~	~~52 MMBtu/ hr Biomass Hurst Boiler~~	~~40 CFR 52.21~~ ~~40 CFR 60, Subpart A~~ ~~40 CFR 60, Subpart Dc~~ ~~40 CFR 63, Subpart DDDDD~~ ~~391-3-1-.02(2)(d)~~ ~~391-3-1-.02(2)(g)~~ ~~391-3-1-.03(2)(c)~~	~~3.2.11, 3.3.3, 3.3.4, 3.3.5, 3.3.6, 3.3.7, 3.3.8, 3.3.9, 3.3.10, 3.3.11, 3.3.12 through 3.3.16, 3.3.21, 3.3.22, 4.1.3, 4.2.8, 4.2.9, 4.2.10, 5.1.1, 5.2.1, 5.2.2, 5.2.8, 5.2.9, 5.2.10. 5.2.11, 6.1.7, 6.2.18 through 6.2.26~~	~~ESP-661~~	~~Electrostatic Precipitator~~

C. Equipment & Rule Applicability

Emission and Operating Caps

Victory Boiler (Source Code: TBD) is subject to a PSD Avoidance Limit for NOx emission of 0.046 lb/MMBtu on a 30-day rolling average.

Applicable Rules and Regulations

40 CFR 60, Subpart Db– Standards of Performance for Industrial-Commercial- Institutional Steam Generating Units

The subpart applies to each steam generating unit that commences construction, modification, or reconstruction after June 19, 1984, and that has a heat input capacity from fuels combusted in the steam generating unit of greater than 29 megawatts (MW) (100 million British thermal units per hour (MMBtu/hr)).

Boiler TBD is a natural-gas and fuel oil fired boiler with a heat input rating of 144 MMBtu/hr, constructed after June 19, 1984, therefore it meets the applicability requirements of 40 CFR 60, Subpart Db.

Based on meeting the applicability requirements of NSPS Subpart Db, the emission standards are as follows for Boiler TBD:

- SO_2: The Boiler will combust only natural gas and very low sulfur oil (as defined in 60.41b for units constructed after February 26, 2005: 0.30 weight % sulfur). Pursuant to 40 CFR 60.42b(k)(2), emissions units that fire only very low sulfur oil, gaseous fuel, or a mixture of these fuels with a potential SO_2 emissions rate of 0.32 lb/MMBtu or less are exempt from the SO_2 emissions limit in 40 CFR 60.42b(k)(1). Therefore, the Boiler will not be subject to an SO_2 emissions limit under 40 CFR Part 60, Subpart Db.

- PM: As discussed above, the Boiler will combust only natural gas (a fuel not subject to a PM standard in 40 CFR 60.43b) and very low sulfur oil; therefore, the Boiler will not be subject to any PM emissions limits under 40 CFR Part 60, Subpart Db.

60.43b(h)(5) "On and after the date on which the initial performance test is completed or is required to be completed under § 60.8, whichever date comes first, an owner or operator of an affected facility not located in a noncontinental area that commences construction, reconstruction, or modification after February 28, 2005, and that combusts only oil that contains no more than 0.30 weight percent sulfur, coke oven gas, a mixture of these fuels, or either fuel (or a mixture of these fuels) in combination with other fuels not subject to a PM standard in §60.43b and not using a post-combustion technology (except a wet scrubber) to reduce SO_2 or PM emissions is not subject to the PM limits in (h)(1) of this section."

- Opacity: The boiler will not be subject to the opacity standard while being fired on natural gas. While firing fuel oil (after first fire on fuel oil): 60.43b(f) "On and after the date on which the initial performance test is completed or is required to be completed under §60.8, whichever date comes first, no owner or operator of an affected facility that combusts coal, oil, wood, or mixtures of these fuels with any other fuels shall cause to be discharged into the atmosphere any gases that exhibit greater than 20 percent opacity (6-minute average), except for one 6-minute period per hour of not more than 27 percent opacity. An owner or operator of an affected facility that elects to install, calibrate, maintain, and operate a continuous emissions monitoring system (CEMS) for measuring PM emissions according to the requirements of this subpart and is subject to a federally enforceable PM limit of 0.030 lb/MMBtu or less is exempt from the opacity standard specified in this paragraph." 60.43b(g), "The PM and opacity standards apply at all times, except during periods of startup, shutdown, or malfunction.

- NOx: Pursuant to 40 CFR 60.44b(l)(1), the Boiler must not emit any gases that contain NOx [expressed as nitrogen dioxide (NO_2)] in excess of 0.20 lb/MMBtu heat input on a 30-day rolling average basis (based on a heat release rate for each boiler of greater than 70,000 Btu per hour per cubic foot of furnace volume). This applicable standard applies at **all** times including periods of startup, shutdown, or malfunction. Except as provided under paragraph (j) of this section, compliance with the emission limits under this section is determined on a 30-day rolling average basis.

The Facility will comply with the associated applicable 40 CFR Part 60, Subpart Db notification, reporting, and recordkeeping requirements, as applicable to the Boiler.

40 CFR 63 Subpart DDDDD - National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters

The subpart applies to owners or operators of an industrial, commercial, or institutional boiler or process heater as defined in §63.7575 that is located at, or is part of, a major source of HAP. 40 CFR 63, Subpart DDDDD ("Boiler MACT") sets forth emissions limits and work practice standard s; testing and fuel analyses requirements; and monitoring, recordkeeping, notification, and reporting requirements that potentially apply to boilers and process heaters located at major sources of HAP.

ADM is classified as a major source for HAP, therefore is subject to the Boiler MACT.

40 CFR 63, Subpart DDDDD also defines affected sources as new, reconstructed, or existing emissions units based on the date of June 4, 2010.A boiler is a new unit if construction commenced after June 4, 2010. As such, the Boiler will be classified as a new emission unit with respect to the Boiler MACT.

Boiler TBD will be constructed after June 4, 2010; therefore, it is categorized as a new affected source, and as a new affected source, compliance will be required upon startup.
[40 CFR 63.7495(a)]

The Boiler MACT consists of subcategories of boilers as defined in 40 CFR 63.7575. As determined, the Boiler is classified as a ***"unit designed to burn gas 1 subcategory"*** for purposes of the Boiler MACT. Boilers in this subcategory are not subject to numeric emissions limits or operating limits [63.7500(e)]. The Facility will conduct subsequent annual tune-ups in accordance with the schedules prescribed in 40 CFR 63.7510(g), 40 CFR 63.7515(d), and 40 CFR 63.7540(a)(10).

The one-time energy assessment requirement will not apply to the Boiler since it is a new emissions unit. Initial notifications for the Boiler will be submitted no later than 15 days after the date of actual startup pursuant to 40 CFR 63.7545(c). The Facility will comply with the associated applicable Boiler MACT notification, reporting, and recordkeeping requirements for the Boiler.

391-3-1-.02(2)(d) – Fuel-Burning Equipment

Georgia Rule (d) establishes fly ash and PM, opacity, and NOx emissions limitations for fuel-burning sources. The Boiler will be constructed after January 1, 1972, and have a heat input greater than 10 MMBtu/hr, and less than 250 MMBtu/hr.

Boiler TBD is subject to the requirements outlined in Georgia Rule (d).

The Boiler is subject to the PM emissions limit in 391-3-1-.02(2)(d)(2)(ii) and the opacity limit in 391-3-1-.02(2)(d)(3).

391-3-1-.02(2)(g) – Sulfur Dioxide

Georgia Rule (g) applies to fuel-burning sources and limits the SO_2 emissions and sulfur content of fuels fired in a boiler. Boiler TBD is categorized as a fuel burning source and the unit will have a heat input of 100 MMBtu/hr or greater, the unit shall not burn fuel containing more than 3 percent sulfur, by weight.

D. Permit Conditions

Boilers 630, 640, B115A and B115B and their associated control devices (if applicable) are being removed as a part of this modification, therefore the following conditions referencing these boilers have been deleted or modified to remove the reference.

- Deleted 3.2.3.a Boiler 630 fuels defined.
- Modified 3.2.3.b to remove Boiler 640 fuels allowed.
- Deleted 3.2.3.f for Boilers 115A and 115B biomass fuels.
- Modified 3.2.6 to remove Boilers 630 and 640 from the NOx emission limit.
- Modified 3.2.7 to remove Boilers 630 and 640 from the CO emission limit.
- Deleted 3.2.8 for Boiler 630 short term NOx limit.
- Modified 3.2.9 to remove Boiler 640 from SO2 limit.
- Deleted 3.2.11 for Boilers 115A and 115B fuel defined.
- Deleted 3.2.12 for Boilers 115A and 115B fuel sulfur.
- Modified 3.3.2 to remove Boiler 640 from fuel requirements.
- Modified 3.3.3 to remove Boilers 115A and 115B from NSPS Dc.
- Deleted 3.3.6 for Boilers 115A and 115B stack defined.
- Deleted 3.3.7 for Boilers 115A and 115B opacity.
- Deleted 3.3.8 for Boilers 115A and 115B fly ash and PM emissions.
- Deleted 3.3.9 Boilers 115A and 115B NOx limits.
- Deleted 3.3.10 Boilers 115A and 115B CO limits.
- Deleted 3.3.11 Boilers 115A and 115B electrostatic precipitator.
- Modified 3.3.12 to remove Boilers 115A and 115B and add 701, 705, 650 and TBD to NESHAP DDDDD from 3.3.13.
- Deleted 3.3.13 Boilers 630 and 640 removed from NESHAP DDDDD.
- Modified 3.3.17 Boilers 630 and 640 removed from NESHAP DDDDD definition.
- Deleted 3.3.19 Boiler 630 NESHAP DDDDD definition.
- Deleted 3.3.20 Boiler 630 NESHAP DDDDD standards.
- Deleted 3.3.21 Boilers 115A and 115B NESHAP DDDDD definition.
- Deleted 3.3.22 Boilers 115A and 115B NESHAP DDDDD standards.
- Modified 3.4.3 Boilers 630 and 640 removed from opacity and PM standards.
- Modified 3.4.4 Boilers 630 and 640 removed from fuel sulfur standard.

The following conditions are new conditions associated with the installation and operation of the Victory Boiler (Source Code: TBD):

Permit Condition 3.2.13 limits NOx emissions from Victory Boiler (Source Code: TBD) as outlined by the Boiler MACT, to less than 0.046 lb/MMBtu on a 30-day rolling average.

Permit Condition 3.3.23 classifies the Victory Boiler (Source Code: TBD) as a unit designed to burn gas 1 fuels, and the Condition also defines a Unit Designed to Burn Gas 1 fuels under the Boiler MACT.

Permit Condition 3.3.24 requires the Permittee to comply with all applicable conditions of NSPS Subparts A and Db for the Victory Boiler (Source Code: TBD).

Permit Condition 3.3.25 requires the Permittee to comply with the SO_2 limitations of NSPS Subpart Db, where the Permittee shall burn no fuel other than natural gas or very low sulfur oil in the Victory Boiler (Source Code: TBD), this requirement subsumes Georgia Rule (g).

Permit Condition 3.3.26 requires the Permittee to comply with the opacity limitations of NSPS Subpart Db, this requirement subsumes the opacity limit in Georgia Rule (d).

Permit Condition 3.3.27 limits NOx emissions from Victory Boiler (Source Code: TBD) as outlined by NSPS Db, to less than 0.2 lb/MMBtu on a 30-day rolling average, **including** periods of startup, shutdown, and malfunction. The Boiler will be able to comply with the Db limit for periods outside of startup, shutdown, and malfunction due to the more stringent PSD Avoidance limit in 3.2.13.

Permit Condition 3.3.28 outlines the work practice standards specified in Table 3.3.28 for Victory Boiler TBD.

Victory Boiler TBD was added to 3.4.3 for Rule (d) opacity and PM standards.

V. Testing Requirements (with Associated Record Keeping and Reporting)

Boilers 630, 640, B115A and B115B and their associated control devices (if applicable) are being removed as a part of this modification, therefore the following conditions referencing these boilers have been removed or modified.

- Deleted 4.1.3.l Boilers 115A and 115B for test method.
- Deleted 4.1.3.m Boilers 115A and 115B for test method.
- Deleted 4.1.3.n Boilers 115A and 115B for test method.
- Deleted 4.2.1 for Boiler 630 testing on oilseed hulls.
- Deleted 4.2.2 for Boiler 630 annual PM testing.
- Deleted 4.2.3 for Boiler 630 CO and NOx testing.
- Modified 4.2.4 to remove Boiler 640 from testing on vegetable oil.
- Deleted 4.2.6 for Boiler 630 for reopening permit if tested values are higher than calculated.
- Deleted 4.2.8 Boilers 115A and 115B testing other fuels.
- Deleted 4.2.9 additional testing for CO for testing conducted for Condition 4.2.8.
- Deleted 4.2.10 Boilers 115A and 115B additional testing.

The following conditions are new conditions associated with the installation and operation of the Victory Boiler (Source Code: TBD):

Permit Condition 4.2.11 requires the Permittee to conduct performance testing for opacity from the Victory Boiler (Source Code TBD) while firing oil as required under 40 CFR 60.8 to determine compliance with the standards using the procedures and reference methods in NSPS Subpart Db.

Permit Condition 4.2.12 requires the Permittee to determine initial compliance with the emission limits for NOx required under Condition 3.3.27 for the Victory Boiler (Source Code: TBD) using NOx CEMS.

Permit Condition 4.2.13 requires initial tune-up within 13 months of startup.

VI. Monitoring Requirements (with Associated Record Keeping and Reporting)

Boilers 630, 640, B115A and B115B and their associated control devices (if applicable) are being removed as a part of this modification, therefore the following conditions referencing these boilers have been deleted or modified to remove reference to the boilers.

- Deleted 5.2.1 for COMS on Boilers 630, 115A and 115B
- Modified 5.2.2.a to remove Boiler 640 from fuel monitor.
- Modified 5.2.2.d to remove pressure monitoring for baghouses 632 and 633 to Boiler 630.
- Deleted 5.2.2.f temperature monitoring for baghouses 632 and 633 to Boiler 630
- Deleted 5.2.2.g for steam monitoring for Boilers 630, 115A and 115B.
- Modified 5.2.7 to remove Boilers 630 and 640 from NOx and CO monitoring.
- Deleted 5.2.8 Boilers 630, 115A and 115B wood waste monitoring.
- Deleted 5.2.9 Boilers 115A and 115B energy assessment.

The following conditions are new conditions associated with the installation and operation of the Victory Boiler (Source Code: TBD):

Permit Condition 5.2.17 requires the Permittee to install, calibrate, maintain, and operate a system to continuously monitor and record NOx and O_2 (or CO_2) from the Victory Boiler (Source Code: TBD) for NSPS Subpart Db.

Permit Condition 5.2.18 requires the Permittee to obtain NOx emissions data for the Victory Boiler (Source Code: TBD) for at least 75 percent of the operating hours in at least 22 out of 30 successive boiler operating days.

Permit Condition 5.2.19 requires the Permittee to perform quarterly accuracy determinations and daily calibration drift tests in accordance with Appendix F of 40 CFR Part 60 for all CEMS installed on the Victory Boiler.

Permit Condition 5.2.20 requires the Permittee to conduct an annual tune-up of Victory Boiler TBD to demonstrate continuous compliance. Each subsequent tune-up must be no more than 13 months after the previous tune-up.

Permit Condition 5.2.21 allows the Permittee as an alternative to performing subsequent Method 9 tests, to perform subsequent monitoring using Method 22, in the event the maximum 6-minute opacity is less than 10 percent during the most recent Method 9 performance test required by Condition 4.2.1 or 5.2.6.

Permit Condition 5.2.22 requires the Permittee to submit excess emission reports for any excess emissions from Victory Boiler TBD that occur during the reporting period and maintain records in accordance with the guidelines outlined within the Permit Condition.

VII. Other Record Keeping and Reporting Requirements

Boilers 630, 640, B115A and B115B and their associated control devices (if applicable) are being removed as a part of this modification, therefore the following conditions referencing these boilers have been deleted or modified to remove reference to the boilers.

- Modified 6.1.7.b.iii to remove Boiler 640 from fuel consumption exceedance.
- Modified 6.1.7.b.vi to remove Boiler 640 from fuel sulfur exceedance.
- Deleted 6.1.7.b.vii Boiler 630 railroad ties weight exceedance.
- Deleted 6.1.7.b.viii Boiler 630 steam exceedance.
- Deleted 6.1.7.b.xii Boilers 115A and 115B opacity exceedance.
- Deleted 6.1.7.b.xiii Boilers 115A and 115B NOx exceedance.
- Deleted 6.1.7.b.xiv Boilers 115A and 115B fuel violation.
- Deleted 6.1.7.b.xv Boilers 115A and 115B opacity exceedance.
- Modified 6.1.7.c.iv remove Boiler 640 from NOx exceedance.
- Modified 6.1.7.c.v remove Boiler 640 from CO exceedance.
- Deleted 6.1.7.c.vii Boilers 115A and 115B ESP bypass.
- Modified 6.2.2 to remove Boiler 640 from fuel oil records.
- Modified 6.2.3 to remove Boilers 630, 640, 115A and 115B from fuel records.
- Deleted 6.2.4 Boiler 630 railroad ties records.
- Modified 6.2.5 to remove Boilers 630, 640, 115A and 115B from CO records.
- Deleted 6.2.6 Boiler 630 CO calculations.
- Modified 6.2.7 to remove Boilers 630 and 640 from NOx records.
- Deleted 6.2.15 Boilers 115A and 115B fuel amount records.
- Deleted 6.2.16 wood-firing rate for Boilers 115A and 115B.
- Modified 6.2.21.c to remove Boiler 640 from compliance reports.
- Deleted 6.2.24 Boilers 630, 115A and 115B Subpart DDDDD records.
- Deleted 6.2.26 Boilers 115A and 115B tune-up records.

The following conditions are new conditions associated with the installation and operation of the Victory Boiler (Source Code: TBD):

Permit Condition 6.1.7.a.iii classifies any 30-day rolling average during which the NOx emissions for the Victory Boiler (Source Code: TBD), measured and recorded in accordance with Condition 5.2.18, are in excess of 0.20 lb/MMBtu heat input as excess emissions under NSPS Subpart Db.

Permit Condition 6.1.7.b.xvi classifies any period of process operation during which the facility burns fuel in the Victory Boiler (Source Code: TBD) that is other than natural gas or oil meeting the definition of very low sulfur fuel oil as defined in 40 CFR 60 Subpart Db and meeting the sulfur content limit in Condition 3.2.25 as an exceedance.

Permit Condition 6.1.7.b.xvii classifies any time during which the opacity of gases from the Victory Boiler TBD is equal to or exceeds the opacity limit in Permit Condition 3.3.26 as an exceedance.

Permit Condition 6.1.7.b.xviii classifies any 30-day average over 0.046 lbs NOx/MMBtu an exceedance.

Permit Condition 6.1.7.d.iii requires a statement certifying that only fuel meeting the definition of natural gas under 40 CFR 60.41 or fuel oil meeting the definition of very low sulfur fuel oil under 40 CFR 60.41 (and the sulfur limit in Condition 3.2.25) was burned in the Victory Boiler (Source Code: TBD) during the reporting period.

Permit Condition 6.2.27 requires initial startup notification for Victory Boiler.

Permit Condition 6.2.28 requires submittal of initial CEMS compliance test for NOx.

Permit Condition 6.2.29 requires the Permittee to record and maintain records of the amounts of each fuel combusted in the Victory Boiler (Source Code: TBD) during each day and calculate the annual capacity factor for natural gas and oil for each boiler for the reporting period.

Permit Condition 6.2.30 requires the Permittee to maintain records of opacity for the Victory Boiler (Source Code TBD).

Permit Condition 6.2.31 requires the Permittee to maintain records of the information for each steam generating unit operating day for the Victory Boiler (Source Code: TBD) outlined in 40 CFR 60.49b(g).

Permit Condition 6.2.32 requires the Permittee to obtain and maintain fuel receipts for the Victory Boiler.

Permit Condition 6.2.33 requires the Permittee to submit a notification of alternative fuel use within 48 hours of the declaration of each period of natural gas curtailment or supply interruption.

Permit Condition 6.2.34 outlines the periodic reporting requirements as specified in 40 CFR 63.7550 and Table 9 of 40 CFR 63 Subpart DDDDD and the schedule specified in 40 CFR 63.7550(b) for the operation of the Victory Boiler (Source Code: TBD).

Permit Condition 6.2.35 outlines the recordkeeping requirements under 40 CFR 63 Subpart DDDDD, for the operation of the Victory Boiler TBD.

Permit Condition 6.2.36 requires DDDDD records be maintained in a suitable form, readily available and for 5 years.

Addendum to Narrative

The 30-day public review started on month day, year and ended on month day, year. Comments were/were not received by the Division.

//If comments were received, state the commenter, the date the comments were received in the above paragraph. All explanations of any changes should be addressed below.//